



General Motors LLC  
2525 E Abram St  
Arlington, TX 76010

July 26, 2011

Texas Commission on Environmental Quality  
Office of Permit Administrative Review  
Air Permits Division (MC-161)  
P.O. Box 13087  
Austin, Texas 78711-3087

Re: Clean Air Act Title V Permit Renewal Application (FOP O-01151)  
General Motors Arlington Assembly Plant

To Whom It May Concern:

General Motors Corporation hereby submits an application to renew its Title V Federal Operating Permit (FOP) for the Arlington Assembly Plant located in Arlington Texas. We are submitting this application under Title 30 of the Texas Administrative Code Sections 122.133 (30 TAC 122.133) and 122.134 (30 TAC 122.134). Under the terms of these regulations, our facility is required to submit its renewal application no earlier than 18 months and no later than 6 months prior to the expiration of the FOP. Because the current FOP is set to expire on March 9, 2012, this application is timely submitted prior to September 6, 2011. The timeliness of our application is important because, in the event that the TCEQ fails to issue the renewal before the expiration of the FOP, our plant may continue to operate under the existing permit if it has filed a timely and administratively complete application. GM also understands that under 30 TAC 122.134(a) the application will be deemed complete on the 61<sup>st</sup> day after the application has been filed, unless the agency requests additional information in that time period.

The application we are filing today contains all of the required information for a determination of administrative completeness. Specifically, the application includes the required TCEQ forms as well as the appropriate certifications. The following forms are included:

- TCEQ Form OP-1 Site Summary Information
- TCEQ Form OP-2 Application for Permit Revision/Renewal
- TCEQ Form OP-REQ1 Application Area-wide Applicability Determinations and General Information
- TCEQ Form OP-ACPS Application Compliance Plan and Schedule
- TCEQ Form OP-CRO1 Certification by Responsible Official



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Below are new applicable requirements that have occurred since the last FOP renewal. General Motors is not aware of any other new applicable requirements.

1. 40 CFR Part 63 Applicability

Industrial, Commercial & Institutional Boilers and Process Heaters

The final *National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters* (Subpart DDDDD) was published on May 18, 2011.

Reciprocating Internal Combustion Engines (RICE)

The final *National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Reciprocating Internal Combustion Engines (RICE)* (Subpart ZZZZ) was published on March 9, 2011.

2. Greenhouse Gas Applicability

- a. Tailoring Rule – 40 CFR Part 51, 52 & Part 70
- b. Reporting Rule - 40 CFR Part 98

3. 40 CFR Part 64 Compliance Assurance Monitoring

The requirements for CAM Plans for the primer surface and topcoat operations abatement equipment were addressed in the 2006 renewal submittal. No changes are required.

Please contact Chris Boehle (817) 652-2453 of our facility immediately if you believe that additional information is needed to meet the standard of administrative completeness or if you have any questions or comments.

Sincerely,

Paul D. Graham  
Plant Manager, GM Arlington Assembly Plant

cc: TCEQ Region IV Office Air Section Manager  
EPA Region 6 Air Permits